

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

vs.

Case No. 18-cr-20128

Hon. Stephen J. Murphy, III

D-1, Christian Maire,
D-2, Arthur Simpatico,
D-3, Jonathan Negroni Rodriguez,
D-4, Michal Figura,
D-5, Odell Ortega,
D-6, Brett Jonathan Sinta,
D-7, Caleb Young,
D-8, Daniel Walton,
D-9, William T. Phillips,

Defendants.

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**GOVERNMENT'S SECOND FORFEITURE
BILL OF PARTICULARS**

The United States of America, by and through its counsel, submits this Second Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment (ECF No. 15), and to provide notice of specific property the Government intends to forfeit upon conviction.

Pursuant to 18 U.S.C. § 2253 and 18 U.S.C. § 2428, upon conviction of a Title 18 offense alleged in the Indictment, and in addition to those assets specifically named in the Forfeiture Bill of Particulars (ECF No. 40), defendants shall forfeit to the United States the following property involved in or used in any knowing violation of such offense:

- 1) Synology Disk Station, S/N 14B0MN489202
- 2) Acer Laptop, S/N NK1101304E4247A7DC7210
- 3) ViewSonic Tablet S/N 1M2110460064010
- 4) Western Digital External Hard Drive, My Passport Ultra S/N WX71EA3TNK22
- 5) Patriot 128GB Micro SD Card
- 6) Transcend 16GB Thumb Drive
- 7) Seagate 4TB Expansion Desktop Drive, S/N NA4K8S4D
- 8) Motorola XT1540 Cell Phone
- 9) Two Motorola XT1687 Cell Phones
- 10) Western Digital My Book, S/N WMC1T3785928
- 11) Asus Laptop, S/N E9N0CJ056408387

Such notice does not limit the Government from seeking the forfeiture of additional specific property or limit the Government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

Matthew Schneider
United States Attorney

s/Philip A. Ross
Philip A. Ross
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3211
(313) 226-9790
philip.ross@usdoj.gov
VA Bar No. 70269

Dated: April 16, 2018

CERTIFICATION OF SERVICE

I hereby certify that on April 16, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

s/Philip A. Ross
Philip A. Ross
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226-3211
(313) 226-9790
philip.ross@usdoj.gov
VA Bar No. 70269